

EG&G ROCKY FLATS, INC.
ROCKY FLATS PLANT, P.O. BOX 464, GOLDEN, COLORADO 80402-0464 • (303) 966-7000

9.1-RF-2442

Attn: D. P. Simonson

On April 19, 1991, a meeting was held between representatives of EG&G Rocky Flats, Inc. and DOE, RFO to discuss applicability of the IM/IRA process for pumping groundwater from the interceptor trench pump house (ITPH) downgradient of the solar ponds, storing groundwater in tanks, and treating the water in flash evaporators. The meeting was the result of receiving comments from the Colorado Department of Health (CDH) on the Environmental Assessment for the dewatering and RCRA partial closure activities for the solar ponds. The CDH comments stated that an IM/IRA for interim groundwater treatment is required for the project. DOE RFO and EG&G representatives at the referenced meeting agreed that modifying the RCRA Part A Permit Application would allow the project to proceed and to be completed more expeditiously than would performing an IM/IRA study for the project. Operation of the ITPH is to prevent contaminant migration into North Walnut Creek. Currently, the water collected in the ITPH system is being returned to the Solar Evaporation Ponds.

Modification of the Part A Permit Application is preferable because the IM/IRA process outlined in the IAG is lengthy (approximately 410 working days), the IM/IRA process requires public review and comment which could result in substantial project modifications, and the IM/IRA process would result in a schedule impact to the solar pond clean out operations (pondcrete) and implementation of the RFI/RI work plan as required in the AIP and IAG, respectively. In addition, since continuous work on the project could be perceived as prejudicing the IM/IRA decision and approval process, equipment purchased or in the process of being purchased for the project may need to be returned or requisitions cancelled, resulting in potential cost increases for the project.

In order to determine if the regulatory agencies were correct to request an IM/IRA study be performed, applicable regulatory documents covering the solar evaporation ponds were reviewed to determine if pumping, storage, and treatment of the interceptor trench groundwater was covered under an existing permit or agreement. The documents reviewed included the Interagency Agreement (IAG), the Agreement in Principle (AIP), all RCRA Permit applications and modifications thereto in which the solar evaporation ponds were covered, and various regulations covering both RCRA and CERCLA IM/IRAs and corresponding guidance documents.

ADMIN RECORD

A-UU04-000001

DIST.	LTR	ENC
BRETZKE, J.C.		
BURLINGAME, A.H.		
COPP, R.D.		
CROUCHER, D.W.		
DAVIS, J.G.		
EVERED, J.E.	X	
FERRERA, D.W.		
FERRIS, L.R.		
RAIKOR, F.J.		
RANCIS, G.E.	X	
SODWIN, R.		
HEALY, T.J.		
DEKFER E.H.		
JENS, J.P.		
ELEE, P.B.		
ERSH, J.M.	X	
KIRBY, W.A.		
KIRKEBO, J.A.		
EE, E.M.	X	
MAJESTIC, JR.		
MATTHEWS, I.A.		
MEURRENS, B.E.		
MORGAN, R.V.	X	
NORTH, P.		
PALMER, L.A.		
POTTER, G.L.	X	
PIZZUTO, V.M.		
PHOADES, JJ	X	
SAFFELL, B.F.		
SWANSON, E.B.		
WIEBE, J.S.		
WILKINSON, R.B.		
WILLIAMS, R. E.		
WILSON, J.M.		
YOUNG, E.R.		
ZANE, J.O.	X	
Gamm, C.	X	
Grady, MB	X	
Hone, JT	X	
Horner, DR	X	
Ingraham, TC	X	
Jag, RT	X	
Khor, KW	X	
Nesta, SY	X	
Edrich, PW	X	
CORRESPONDENCE CONTROL TRAFFIC	x	x

CLASSIFICATION:

UCNI		
UNCLASSIFIED	X	X
CONFIDENTIAL		
SECRET		

**AUTHORIZED CLASSIFIER
SIGNATURE**

DATE 7/28/91

IN REPLY TO LTR NO. 3

V/A

PC# 11

LTR APPROVALS: *[Signature]*

CG-200A

EE-93

ORIG & TYPIST INITIALS

ITC / 015

RE 46460 (B-11-2021)

9F-46469 (Rev. 3/91)

Robert M. Nelson, Jr.
May 13, 1991
91-RF-2442
Page 2

The regulations and pertinent guidance documents indicate that the type of operation in question, i.e., pumping groundwater, storage in tanks, and treatment by evaporation in order to prevent contaminant migration, clearly constitutes an IM/IRA. IM/IRA actions must be permitted either through a RCRA Permit for RCRA facilities, or through an IM/IRA Decision Document for CERCLA sites.

Operation of the existing interceptor trench system is not currently covered by a RCRA permit. A RCRA Permit is expected to be issued to the RFP for storage operations within the next few months. The RCRA permit will incorporate attachments one through four of the IAG, which specify that the CERCLA process for IM/IRA's be followed. It may be possible to modify the permit once it is finalized to address the ITPH pumping, storage and treatment operations separately, but this should be discussed with the regulatory agencies.

In summary, the IM/IRA process outlined in the IAG appears to be appropriate for operation of the interceptor trench, storage tank, and flash evaporator system. However, performing this process will severely impact the solar pond clean out operation schedule in the AIP and subsequently the IAG schedule. The regulatory agencies should be contacted as to whether they want to expedite the clean out of the ponds by addressing the ITPH pumping, storage and treatment operations separately in RFP's RCRA Permit for storage operations, or whether they would prefer the slower IM/IRA process.

I recommend that you contact the regulatory agencies and sponsor the modification of the Part A permit since it is most expeditious in implementing the IAG on schedule. Should you have any questions, please contact Tom Greengard or Randy Ogg of the Remediation Programs Division at extension 7121 or 7079 respectively.



J. M. Kersh, Associate General Manager
Environmental & Waste Management
EG&G Rocky Flats, Inc.

JTC:plf

Orig. and 4 cc - R. M. Nelson, Jr.

Enclosure:
As Stated

cc:
F. R. Lockhart - DOE, RFO
T. E. Lukow - DOE, RFO

TITLE	ACTIVITY DURATION (DAYS)	TOTAL COST (\$K)	NOTES
Preliminary Identification of ARARs	61	-	
RFP Review Draft RFI Report	21	-	
Finalize Draft RI/RFI Report	21	46	
EPA/CDH Review RI/RFI Report	62	0	
Resolve Comments for RI/RFI Report	41	70	
Review and Approve RI/RFI Report	21	20	
Treatability Study			
ARAR Determinations	40	-	
Treatability Study Scope and Needs	20	-	
Treatability Study Plan Bench/Pilot Studies	20	-	
Perform Bench/Pilot Treatability Studies	90	-	
Identify and Screen Technologies	20	-	
Assemble/Define Alternatives	10	-	
Screen Alternatives	10	-	
Detailed Evaluation of Alternatives	10	-	
IM-IRA Decision Document (IM/IRAP)			
Prepare Preliminary Draft (IM/IRAP) & Treatability Studies	82	127	
RFP Review Draft IM/IRAP	21	23	
Resolve Comments & Finalize Draft	21	18	
EPA/CDH Review IM/IRAP	62	0	
Resolve Comments & Finalize IM/IRAP	42	69	
EPA/CDH Review Proposed IM/IRA Decision Document	5	-	
Public Comment Period Activities (IM/IRAP)	42	73	
Response to Public Comm/Final IM/IRAP	42	-	
DOE/CDH/EPA Review Responsiveness Summary	21	0	

TITLE	ACTIVITY DURATION (DAYS)	TOTAL COST (\$K)	NOTES
Resolve Issues & Finalize (IM/IRAP)	41	93	
EPA/CDH Review and Approve IM/IRAP	21	-	
Public Review of Responsiveness Summary	10	5	
Environmental Assessment (EA) (See Remedial Action EA)			
Interim Measure Design			
Perform Title I Design	63	-	
Prepare IM Design Work Plan	21	-	
RFP Review Title I Design	21	-	
EPA/CDH Review and Approve IM Design Work Plan	21	-	
CDH/DOE/EPA/RFP Review Title II Design	42	0	
Finalize Title II Design	42	41	
EPA/CDH Review & Approve IM Title II Design	21	-	
Prepare Construction Package	21	41	
Title III Design As-Built Verification	62	121	
Resolve Issues & Finalize Title I Design	21	-	
Title II Design Eng. Plans & Specs	123	239	
Interim Measure Construction			
Contract Negotiation & Mobilize	104	200	
Construction	Var.		(Site-Specific)
Performance Monitoring & Assessment (See Remedial Action PAR)			